THE NATIONAL ASSOCIATION OF PORTABLE X-RAY PROVIDERS POLITICAL ACTION COMMITTEE

2111 Wilson Boulevard Suite 600 Arlington, Virginia 22201

October 23, 2001

Ms. Collect Marming Reports Analyst Federal Election Commission 999 E Street, NW Washington, DC 20463

RE: C-00347658 - October Quarterly Report (7/1/00-9/36/00)

Dear Ms. Manning:

I am writing in response to your letter dated October 10, 2001 regarding the October Quarterly Report (7/1/00-9/30/00) for the National Association of Portable X-Ray Providers Political Action Committee (NAPXP-PAC).

On July 24, 2000 the PAC requested that the Association pay \$10,000 in administrative expenses to Halsey Rains & Associates. The Association misunderstood the request and rather than paying Halsey Rains, it made a wire transfer into the PAC account. Prior to the approval of the payment, a question was raised regarding two of the invoices. It was eventually agreed that we would pay only \$8,000. On January 16, 2001, as agreed, we paid Halsey Rains & Associates \$8,000. We had received conflicting advice regarding the payment of PAC administrative expenses. The transfer made in July was the result of the Association staff being under the impression that we had paid the invoices. immediately and that all administrative expenses would be paid through the PAC. We had decided instead that the Association would pay these invoices from its treasury funds.

After receiving your letter, we conducted a full review of PAC activity. We are in the process of amending several of our filings to provide clarity to the public record. We have received a refund of the payment made to Halsey Rains & Associates and we have subsequently refunded the Association the full amount that had been erroncousty. transferred. I have enclosed a copy of the refund check and we will disclose these transactions on our Year-End Report (7/1/01-12/31/01). Additionally, in order to prevent any future mistakes, we have engaged the services of a professional compliance firm, we

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have stopped using the Aristotle software that had caused us so many difficulties in producing our reports, and we have streamlined our approval process and communications within the PAC.

White I understand that the Commission may take further action regarding this matter, I believe that we have taken the necessary corrective steps to provide an accurate reporting of all activity of NAPXP-PAC. If you have any questions or concerns, please contact me.

Sincerely,

Conneth A. Harris

Treasurer

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MAPXP PAC 2111 WILSON BLVD, BLITE 800 ARLINGTON, VA 27201

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OF UNITED BANKSHARES, INC.

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Federal Election Commission

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